

**IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND
SOUTHERN DIVISION**

**THE ESTATE OF
KATHERINE S. MORRIS, et al.**

Plaintiffs,

v.

ISAAC J. GOODWIN, et al.,

Defendants.

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Case No. 8:13-cv-03383-DKC

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**MOTION FOR LEAVE TO WITHDRAW APPEARANCE AND FOR A CONTINUANCE
TO PERMIT APPEARANCE OF NEW COUNSEL FOR THE PLAINTIFFS**

The attorneys of record for the Plaintiffs, Marguerite Morris and the Estate of Katherine S. Morris, Bacon, Thornton & Palmer, L.L.P. and Patricia Thornton, respectfully move, pursuant to Local Rule 101.2(a) and (b), that they be permitted to withdraw their appearance in this case and move for a reasonable continuance to permit the Plaintiffs to retain other counsel, and state:

1. Undersigned counsel and their client, Marguerite Morris (“Morris”), have irreconcilable differences concerning the prosecution of the above captioned lawsuit, and counsel cannot continue to represent Morris in this matter.

2. Undersigned counsel has informed Marguerite Morris (“Morris”) of her obligation to obtain new counsel to represent the Estate of Katherine S. Morris or risk dismissal of that party’s claims. In addition, they have recommended that Morris obtain new counsel to enter his or her appearance on behalf of Morris, as an individual Plaintiff, or that she contact the clerk’s office to advise them that she intends to proceed pro se. (*See* Certificate required by Local Rule 101.2(a) and (b), attached.)

3. Undersigned counsel further requests that this Court grant Morris a reasonable continuance so that she may, if she chooses to do so, obtain new counsel and so that they may familiarize themselves with this matter. As discovery has not yet begun in this matter, such a continuance would not be prejudicial to any party.

WHEREFORE, the attorneys of record for the Plaintiffs respectfully request that this Court grant their Motion for Leave to Withdraw and for a Continuance.

Respectfully Submitted,

/s/ Patricia M. Thornton
Patricia M. Thornton, # 03201
Bacon, Thornton & Palmer, L.L.P.
6411 Ivy Lane, Suite 500
Greenbelt, MD 20770
Phone: (301) 345-7001
Fax: (301) 345-7075
pthornton@lawbtp.com
Attorney for Marguerite Morris

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 12 day of September 2014, a copy of the foregoing was served upon all counsel of record via the Court's ECF system and by first class U.S. mail to all unrepresented parties at their last known address:

Mr. Isaac Jerome Goodwin
1920 Rayconda Place, Apt. 108
Fayetteville, North Carolina 28304

Thomas E. Neary, Esq.
Rollins, Smalkin, Richards & Mackie, LLC
401 North Charles Street
Baltimore, MD 21201

/s/ Patricia M. Thornton _____
Patricia M. Thornton

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CERTIFICATE REQUIRED BY RULE 101.2(a) and (b)

Pursuant to the requirements of Local Rule 101.2(a) and (b), undersigned counsel states the following:

1. On September 2, 2014, Plaintiff, Marguerite Morris, was served with a letter by email and prepaid first-class mail to her last known address, **45985 North Greens Rest Drive, Great Mills, Maryland 20634**, informing her of the intention of the undersigned and her firm, Bacon, Thornton & Palmer, L.L.P. to withdraw from this case in seven (7) days and cease representation of the Plaintiffs.

2. Ms. Morris was also advised that she should obtain new counsel to represent her, or that she should contact the Court Clerk, and tell them that she intended to proceed pro se in this matter.

3. Ms. Morris was also advised that she must obtain new counsel to enter his or her appearance for Plaintiff the Estate of Katherine S. Morris or that the claims of that party will be subject to possible dismissal.

Respectfully Submitted,

/s/ Patricia M. Thornton

Patricia M. Thornton, # 03201

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Attorney for Marguerite Morris